

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JUAN JOSE HARO

V.

CIVIL ACTION 4:24-CV-04466

EQUISOLAR, INC., SOLAR MOSAIC, LLC,  
and ASHLEY GERSHOONY

**Joint Discovery/Case Management Plan  
Under Rule 26(f)  
Federal Rules of Civil Procedure**

JUAN JOSE HARO, Plaintiff, and Defendants EQUISOLAR, INC. and ASHLEY GERSHOONY hereby furnish the following information pursuant to Rule 26(f) of the Federal Rules of Civil Procedure.

1. State when the conference of the parties required by Rule 26(f) was held, and identify the counsel who represented each party.

**RESPONSE:**

**Benjamin K. Sanchez, Plaintiff's Counsel, and Lema Mousilli,  
Defendants' Counsel, conferred on December 24, 2024.**

2. List the cases related to this one that are pending in any state or federal court with the case number and court.

**RESPONSE: None.**

3. Specify the allegation of federal jurisdiction.

**RESPONSE: Diversity of citizenship of the Parties, pursuant to 28 U.S.C. § 1332.  
Plaintiff is an individual citizen residing in Texas. Defendant**

**Equisolar, Inc. is a corporation incorporated and existing under the laws of California, with its principal place of business in California and doing business in Texas. Ashley Gershoony is an individual citizen residing in California.**

**Solar Mosaic, LLC has not yet entered an appearance.**

4. Name the parties who disagree and the reasons.

**RESPONSE: Plaintiff does not know who the individual members of Solar Mosaic, LLC are and thus are unable to verify the citizenship of its members.**

5. List anticipated additional parties that should be included, when they can be added, and by who they are wanted.

**RESPONSE: None.**

6. List anticipated interventions.

**RESPONSE: None.**

7. Describe class-action issues.

**RESPONSE: Plaintiff's counsel is currently investigating whether the following case was filed as an individual action or class action and will update the Court when it confirms either way: Index No. 24-cv-6208, *Claver Campbell v. Solar Mosaic, LLC, et al.*, in the United States District Court for the Eastern District of New York.**

8. State whether each party represents that it has made the initial disclosures required by Rule 26(a). If not, describe the arrangements that have been made to complete the disclosures.

**RESPONSE: No party has made the initial disclosures required by Rule 26(a). Plaintiff and Defendants have agreed to serve the initial disclosures no later than Friday, January 17, 2025.**

9. Describe the proposed agreed discovery plan, including:
- A. Responses to all the matters raised in Rule 26(f).
  - B. When and to whom the plaintiff anticipates it may send interrogatories.
  - C. When and to whom the defendant anticipates it may send interrogatories.
  - D. Of Whom and by when the plaintiff anticipates taking oral depositions.
  - E. Of Whom and by when the defendant anticipates taking oral depositions.
  - F. When the plaintiff (or the party with the burden of proof on an issue) will be able to designate experts and provide the reports required by Rule 26(a)(2)(B), and when the opposing party will be able to designate responsive experts and provide their reports.
  - G. List expert depositions the plaintiff (or the party with the burden of proof on an issue) anticipates taking and their anticipated completion date. See Rule 26(a)(2)(B) (expert report).
  - H. List expert depositions the opposing party anticipates taking and their anticipated completion date. See Rule 26(a)(2)(B) (expert report).

**RESPONSE:**

- A. All matters were discussed.**
- B. All Defendants by March 17, 2025.**
- C. Defendants anticipate serving Plaintiff with interrogatories in the next 60 to 90 days.**
- D. By June 1, 2025, Plaintiff anticipates taking the depositions of Defendant Ashley Gershoony and the designated corporate representatives of Defendants Equisolar, Inc. and Solar Mosaic, LLC. Plaintiff reserves the right to take additional depositions based upon information learned in discovery and depositions.**
- E. Defendants Equisolar, Inc. and Ashley Gershoony anticipate taking the depositions of Plaintiff Juan Jose Haro in the next 90 to 120 days.**
- F. By July 1, 2025, Plaintiff will be able to designate experts and provide reports. By August 1, 2025, Defendants Equisolar, Inc.**

**and Ashley Gershoony will be able to designate experts and provide reports.**

**G. By September 1, 2025, Plaintiff anticipates taking the depositions of Defendants' experts.**

**H. By October 1, 2025, Defendants Equisolar, Inc. and Ashley Gershoony anticipate taking the depositions of Plaintiff's experts.**

10. If the parties are not agreed on a part of the discovery plan, describe the separate view and proposals of each party.

**RESPONSE: The parties are in agreement.**

11. Specify the discovery beyond initial disclosures that has been undertaken to date.

**RESPONSE: None.**

12. State the date the planned discovery can reasonably be completed.

**RESPONSE: November 1, 2025**

13. Describe the possibilities for a prompt settlement or resolution of the case that were discussed in your Rule 26(f) meeting.

**RESPONSE: Counsel discussed agreeing to arbitration and thus staying this action in this Court pending the result of arbitration. Plaintiff is also amenable to mediation. The Parties have agreed to dismiss Defendant Ashley Gershoony as a Defendant in this action.**

14. Describe what each party has done or agreed to do to bring about a prompt resolution.

**RESPONSE: Counsel for the Parties have discussed the issues noted in response to #13 hereinabove by telephone on December 23, 2024.**

15. From the attorneys' discussion with the client, state the alternative dispute resolution techniques that are reasonably suitable.

**RESPONSE: Plaintiff is amenable to both mediation and arbitration. Defendants Equisolar, Inc. and Ashley Gershoony are amenable to arbitration. It is anticipated that Plaintiff will dismiss his claims against Defendant Ashley Gershoony.**

16. Magistrate judges may now hear jury and non-jury trials. Indicate the parties' joint position on a trial before a magistrate judge.

**RESPONSE: The Parties are not amenable to a trial before a magistrate judge.**

17. State whether a jury demand has been made and if it was made on time.

**RESPONSE: Plaintiff made a jury demand in the state action but has not yet made a jury demand herein, as the Parties anticipate this case will be removed to arbitration by agreement.**

18. Specify the number of hours it will take to present the evidence in this case.

**RESPONSE: The presentation of all evidence by all Parties is expected to take 40 hours.**

19. List pending motions that could be ruled on at the initial pretrial and scheduling conference.

**RESPONSE: None.**

20. List other motions pending.

**RESPONSE: None.**

21. Indicate other matters peculiar to this case, including discovery, that deserve the special attention of the court at the conference.

**RESPONSE: The Parties have agreed to submit this case to arbitration. Plaintiff has agreed to dismiss his claims against Defendant Ashley Gershoony.**

22. List the names, bar numbers, addresses, and telephone numbers of *all* counsel.

**RESPONSE: Benjamin K. Sanchez  
Texas Bar No. 24006288  
USDC-SDTX No. 23410  
Sanchez Law Firm  
150 W. Parker Rd., Ste. 201  
Houston, TX 77076  
713-780-7745  
Counsel for Plaintiff, Juan Jose Haro**

**Lema Mousilli  
Texas Bar No. 24056016  
USDC-SDTX No. 1358290  
Mousilli Law, PLLC  
11807 Westheimer Rd.  
Ste. 550, PMB 624  
Houston, TX 77077  
281-305-9313  
Counsel for Defendants, Equisolar, Inc. and Ashley Gershoony**

Respectfully submitted,

/s/ Benjamin K. Sanchez

Benjamin K. Sanchez  
Texas Bar No. 24006288  
USDC-SDTX No. 23410  
SANCHEZ LAW FIRM

/s/ Lema Mousilli

Lema Mousilli  
Texas Bar No. 24056016  
USDC-SDTX No. 1358290  
MOUSILLI LAW, PLLC

150 W. Parker Rd.  
Ste. 201  
Houston, TX 77076  
713-780-7745 (tel)  
[service@sanchezlawfirm.com](mailto:service@sanchezlawfirm.com)  
Attorney for Plaintiff,  
Juan Jose Haro

11807 Westheimer Rd.  
Ste. 550 PMB 624  
Houston, TX 77077  
281-305-9313 (tel)  
[lema@mousillilaw.com](mailto:lema@mousillilaw.com)  
Attorney for Defendants,  
Equisolar, Inc. And  
Ashley Gershoony

### **Certificate of Service**

I hereby certify that the foregoing document was served on all parties via PACER on December 25, 2024, by /s/ Benjamin K. Sanchez.